

CCC:MEF
F. #2019R01255

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ DEC 17 2019 ★
LONG ISLAND OFFICE

UNITED STATES OF AMERICA

- against -

ROBERT KLEEHAMMER,

Defendant.
----- X

INDICTMENT

Cr. No. **C R 19 598**

(T. 18, U.S.C., §§ 2252(a)(2),
2252(a)(4)(B), 2252(b)(1), 2252(b)(2),
2253(a), 2253(b) and 3551 et seq.; T.
21, U.S.C., § 853(p))

SEYBERT, J.

LINDSAY, M.J.

THE GRAND JURY CHARGES:

COUNT ONE

(Receipt of Child Pornography)

1. In or about and between October 2018 and October 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROBERT KLEEHAMMER did knowingly and intentionally receive one or more visual depictions, to wit: the digital videos and images depicted in the computer files with the MD5 hash values (a) cd2abd2afe30f316ddbb8afc1cc2a53e; (b) d94d5ef4bf8a7266f85660a44bb3dc75; and (c) 1d29b4b620b0e9103b9dd7eb0d5c1da5, using a means and facility of interstate and foreign commerce, and which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual

depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions having been of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

COUNT TWO
(Possession of Child Pornography)

2. On or about September 19, 2019, within the Eastern District of New York, the defendant ROBERT KLEEHAMMER did knowingly and intentionally possess matter which contained one or more visual depictions, to wit: digital videos and images stored on a white Apple hard drive, that had been mailed, and had been shipped and transported using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials which had been mailed and so shipped and transported, by any means, including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions having been of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of: (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B or 2260

of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from such offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including but not limited to a white Apple hard drive, seized from the defendant on September 19, 2019 at his residence in Huntington, New York.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.


(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY,
PURSUANT TO 28 C.F.R. Q.136

F.#: 2019R01255
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

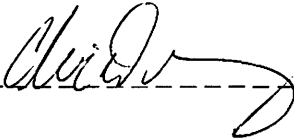
ROBERT KLEEHAMMER,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2),
2253(a), 2253(b) and 3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.



Foreperson

Filed in open court this _____ day.

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Megan E. Farrell, Assistant U.S. Attorney (631) 715-7482